REMARKS

Claims 1, 3 and 4 have been allowed. Claim 2 has been amended. New claim 11 has been added. Thus, claims 1-11 are now pending in the present application. Support for new claim 11 may be found in the specification at, for example, page 11, line 21 to page 12, line 11. Thus, no new matter has been added. Reconsideration and withdrawal of the present rejections in view of the comments presented herein are respectfully requested.

Rejection under 35 U.S.C. § 112, second paragraph

Claims 2 and 5-10 were rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite. The subject matter stated to be indefinite has been canceled from claim 2, thus rendering the rejection moot.

In view of the comments presented above, Applicants respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. §112, second paragraph.

Rejections under 35 U.S.C. 103(a)

Claims 2, 5 and 9-10 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Meier et al (US 4,994,346) further in view of Ciba (Photinitiator) further in view of Bonham et al. (US 3,954,475) and Kobayashi et al. (JP 07-134412).

Claims 2, 5 and 9-10 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Knudsen et al. (US 5,262,280) further in view of Bonham et al. and Kobayashi et al.

Present Claim 2 as amended recites a resin composition including a compound (B) represented by the general formulas (V), (VI), or (X) which generates an acid under irradiation with radiation. The component (B) has a high acid generation efficiency when irradiated with ultraviolet light containing g-rays, h-rays and i-rays, or i-rays (specification, page 21, line 24 to page 22, line 4). None of the cited references cited by the Examiner in connection with either of the rejections of the claims under § 103 disclose or suggest such a compound (B). Thus, neither of the combinations of references provides any suggestion of the pending claims, all of which recite such a compound (B).

Nor would one of ordinary skill in the art know of any reason to modify the disclosures of either combination of references to provide the recited compound (B). The references cited by

the Examiner relate to negative photoresist compositions, while the presently claimed invention relates to a positive resist composition. The chemistry of negative photoresist compositions is quite distinct from that of the recited positive resist compositions. As such, one having ordinary skill in the art would not see any reason to combine the crosslinking agent disclosed in any of the prior art documents with the presently claimed photo acid generator (B), which is not disclosed in any of these documents.

Because compound (B) is not disclosed or suggested by either combination of references, and one having ordinary skill in the art would have no reason to modify the teachings of either combination to provide compound (B), neither of the cited combinations of references support a *prima facie* showing of obviousness.

Moreover, the presence of the recited compound (B) provides unexpected properties which could not have been predicted by one having ordinary skill in the art. In particular, the use of this compound provides a technique capable of forming a resin layer which is excellent in fluidity upon heat bonding and also has excellent adhesion as well as bonding properties and/or sealing properties, after pattern formation, in a photosensitive thermosetting resin composition used as a permanent film (see page 4, lines 19 to 25). As a result, it is possible to provide a photosensitive thermosetting resin composition used as a permanent film, capable of forming a resin layer which is excellent in fluidity upon heat bonding and also has excellent adhesion as well as bonding properties and/or sealing properties, after pattern formation (see page 6, lines 5 to 11). As discussed in Applicants' specification, the presence of the photo acid generator (B), in combination with the crosslinking agent (C) and the epoxy resin (D) recited in present claim 2, leads to these unexpected results discussed above.

These unexpected properties are neither disclosed nor suggested by any of the cited references, either alone or in combination, and could not have been predicted by one having ordinary skill in the art. Thus, the unexpected results strongly support the nonobviousness of the present claims over the cited references. Accordingly, Claim 2 is both novel and nonobvious, and should therefore be allowable. Claim 5, 9 and 10 depend either directly or indirectly on Claim 2, and should also be allowable. Claim 11 is also novel and nonobvious over the cited references, and should also be allowable.

In view of the comments presented above, Applicants respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. §103(a).

No Disclaimers or Disavowals

Although the present communication may include alterations to the application or claims, or characterizations of claim scope or referenced art, Applicant is not conceding in this application that previously pending claims are not patentable over the cited references. Rather, any alterations or characterizations are being made to facilitate expeditious prosecution of this application. Applicant reserves the right to pursue at a later date any previously pending or other broader or narrower claims that capture any subject matter supported by the present disclosure, including subject matter found to be specifically disclaimed herein or by any prior prosecution. Accordingly, reviewers of this or any parent, child or related prosecution history shall not reasonably infer that Applicant has made any disclaimers or disavowals of any subject matter supported by the present application.

CONCLUSION

Applicants submit that all claims are in condition for allowance. No fees are believed to be due. However, if any fees are required, including fees for an extension(s) of time, please charge these to Deposit Account No. 11-1410. Should there be any questions concerning this application, the Examiner is respectfully invited to contact the undersigned at the telephone number appearing below.

Respectfully submitted,

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